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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

AMARJIT KAUR SINGH a/k/a
AMARJIT K. PAWAR.,

Debtor.

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Hearing Date: September 17, 2009
Time: 11:30 a.m.
Objections Due: September 11, 2009
Time: 4:00 p.m.

Chapter 7
Case No.: 108-47147-608

**NOTICE OF MOTION AND APPLICATION IN SUPPORT FOR AN ORDER
DETERMINING NON-CONSENSUAL LIENS FILED AGAINST PROPERTY
LOCATED AT 930 HEMPSTEAD TURNPIKE, FRANKLIN SQUARE, NEW YORK
11510, TO BE VOID AS WHOLLY UNSECURED AND RECLASSIFYING
UNDERLYING CLAIMS AS UNSECURED CLAIMS**

C O U N S E L O R S:

PLEASE TAKE NOTICE that Richard J. McCord, Esq., the Chapter 7 Trustee
("Trustee") of the estate of Amarjit Kaur Singh a/k/a Amarjit K. Pawar ("Debtor"), by and
through his counsel, Certilman Balin Adler & Hyman, LLP, a motion pursuant to 11 U.S.C.
§§105, 506(a)(1) and 506(d) and Rule 3012 of the Federal Rules of Bankruptcy Procedure, will
be made as set forth below:

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|-------------------------|---|---|
| JUDGE | : | Honorable Carla E. Craig |
| HEARING DATE | : | September 17, 2009 at 11:30 a.m. |
| COURTHOUSE | : | United States Bankruptcy Court 271 Cadman Plaza East Courtroom 3529 Brooklyn, New York 11201 |
| RELIEF REQUESTED | : | An Order: (a) pursuant to Sections 506(a)(1) and 506(d) of Title 11 of the United States Code (the “Bankruptcy Code”) and Bankruptcy Rule 3012, (a) determining that the non-consensual judicial liens held by (i) Chase Manhattan Bank (JP Morgan Chase) in the amount of \$27,502.77 (ii) Citicorp, N.A., in the amount of \$7,108.70 (iii) Arrow Financial Services, LLC, in the amount of \$9,085.74, totaling \$43,697.21 (collectively, the “Avoided Liens”), against the Debtor’s non-residential real property located at 930 Hempstead Turnpike, Franklin Square, New York 11510, are void as they are wholly unsecured; (b) reclassifying the claims underlying the Avoided Liens as unsecured claims against the Chapter 7 Estate and directing the holders of the Avoided Liens to file proofs of claim within thirty (30) days from the entry of an Order resolving the motion; and (c) for such other, further and different relief as this Court deems just, proper and equitable. |

PLEASE TAKE FURTHER NOTICE, that objections to the proposed Motion, if any, pursuant to LBR 9006-1 and 9004-1, must be filed in the Office of the Clerk of the Bankruptcy Court electronically in accordance with General Order #M-242 (General Order #M-242 and the Revised Administrative Procedures for the Electronic Case Filing System can be found at www.nyeb.uscourts.gov the official website for the United States Bankruptcy Court for the Eastern District of New York) by registered users of the Court's electronic case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Documents Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered to Chambers) and served in accordance with General Order #M-242 or by first-class mail and served upon the (i) Chapter 7 Trustee, Richard J. McCord, Esq., Certilman Balin Adler & Hyman, LLP, 90 Merrick Avenue, East Meadow, New York 11554 and (ii) the Office of the United States Trustee, 271 Cadman Plaza East, Suite 4529, Brooklyn, New York 11201. All filing and service are to be made so as to be actually received by each party on or before September 11, 2009 at 4:00 p.m.

Dated: East Meadow, New York
August 21, 2009

CERTILMAN BALIN ADLER & HYMAN, LLP
Attorneys for the Chapter 7 Trustee

BY: /s/ Richard J. McCord
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